This is a full and timely response to the outstanding final Office Action mailed July 18, 2007. Claims 1-24 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

1. Response to Objections of the Claims

Claims 7-17 and 21 are subjects to objections for having improper dependencies. The claims have been amended to correct the objections referenced in the Office Action. Withdrawal of the objections is respectfully requested.

2. Response to Rejections of Claims under 35 U.S.C. § 102

Claims 1-6, 18-19, and 23-24 also stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by *Brid* (U.S. Patent No. 6,772,144 B2).

a. Claim 1

As provided in claim 1, Applicants claim:

> A method of authoring a document to be served for rendering on a plurality of classes of device comprising:
>
> defining at least two choices of content which may be styled for a first content portion of the document and conveyed to the server;
>
> defining at least two choices of content which may be styled for a second content portion of the document and conveyed to the server; and
>
> labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the web page and the second content portion of the same web page.

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Brid* does not disclose, teach, or suggest all of the claimed features above.

For example, *Brid* describes a device-independent template which "defines how to display information" or may be regarded as a content structure. *See* col. 2, lines 38-63 and col. 3, lines 22-41. The device independent template is adapted for

a particular device, and this is regarded as a device-specific template. In the examples of Fig. 4 and 5, they show how the device-specific template for Fig. 4 does not call for a chart to be displayed, where the device-specific template for Fig. 5 does. Each of the figures do show the same representations of the data that is common to both. Accordingly, *Brid* fails to teach or suggest "labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the web page and the second content portion of the same web page," as recited in claim 1.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content are defined which may be styled for the second content portion. Therefore, for a requesting device, an approved combination of content for the first portion and the second portion is served to the requesting device when the document or web page is produced.

However, in *Brid*, there are no choices of content present. For example, *Brid* does not disclose producing a web page by incorporating an approved combination of content for a first content portion and a second content portion, where there are multiple choices of content available to be used in the first content portion and there are multiple choices of content available to be used in the second content portion, where an approved combination of a choice from the first portion and a choice from the second portion is what is used in the produced document. In contrast, *Brid* describes adapting a layout or template to a specific device implementation where some data elements may be omitted from the device-specific layout or template. Choices are not defined amongst alternative data elements that are representative of the same content.

In response to the statement in the final Office Action that *Brid* "does disclose labeling content choices approvable as to indicate to the server what choices of content from each portion of the web page are allowable for serving the entire web page (column 5, lines 54-67, with the defining of data elements to be displayed and

the arranging of data elements on a layout seen as labeling an approved combination, since all of some of the content portions are served to the requesting user based on their display format," Applicant respectfully disagrees and iterates that *Brid* fails to disclose at least "defining at least two choices of content which may be styled for a first content portion of the document and conveyed to the server and defining at least two choices of content which may be styled for a second content portion of the document and conveyed to the server," as recited in claim 1. As explained above, *Brid* omits content portions from documents for a device-specific layout and fails to define choices of content for a content portion of a document.

For at least these reasons, claim 1 is not anticipated by *Brid.* Therefore, the rejection of claim 1 should be withdrawn.

b. Claims 2-6

Because independent claim 1 is allowable over the cited art of record, dependent claims 2-6 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims contain all the features of independent claim 1. *See In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claims 2-6, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

c. Claim 18

As provided in claim 18, Applicants claim:

> A system for authoring a document to be served for rendering on a plurality of classes of device comprising:
> a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document; and
> a labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document.

Applicants respectfully submit that independent claim 18 is allowable for at least the reason that *Brid* does not disclose, teach, or suggest at least all of the claimed features above.

For example, *Brid* describes a device-independent template which "defines how to display information" or may be regarded as a content structure. See col. 2, lines 38-63 and col. 3, lines 22-41. The device independent template is adapted for a particular device, and this is regarded as a device-specific template. In the examples of Fig. 4 and 5, they show how the device-specific template for Fig. 4 does not call for a chart to be displayed, where the device-specific template for Fig. 5 does. Each of the figures do show the same representations of the data that is common to both. Accordingly, *Brid* fails to teach or suggest "a labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document," as recited in claim 18.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content are defined which may be styled for the second content portion. Therefore, for a requesting user, an approved combination of content for the first portion and the second portion is served to the requesting user when the document or web page is produced.

However, in *Brid*, there are no choices of content present. For example, *Brid* does not disclose producing a web page by incorporating an approved combination of content for a first content portion and a second content portion, where there are multiple choices of content available to be used in the first content portion and there are multiple choices of content available to be used in the second content portion, where an approved combination of a choice from the first portion and a choice from the second portion is what is used in the produced document. In contrast, *Brid* describes adapting a layout or template to a specific device implementation where some data elements may be omitted from the device-specific layout or template.

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Choices are not defined amongst alternative data elements that are representative of the same content.

In response to the statement in the final Office Action that *Brid* "does disclose labeling content choices approvable as to indicate to the server what choices of content from each portion of the web page are allowable for serving the entire web page (column 5, lines 54-67, with the defining of data elements to be displayed and the arranging of data elements on a layout seen as labeling an approved combination, since all of some of the content portions are served to the requesting user based on their display format," Applicant respectfully disagrees and iterates that *Brid* fails to disclose at least "a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document," as recited in claim 18. As explained above, *Brid* omits content portions from documents for a device-specific layout and fails to define choices of content for a content portion of a document.

For at least these reasons, claim 18 is not anticipated by *Brid*. Therefore, the rejection of claim 18 should be withdrawn.

d. Claim 19

Because independent claim 18 is allowable over the cited art of record, dependent claim 19 (which depends from independent claim 18) is allowable as a matter of law for at least the reason that the dependent claim contains all the features of independent claim 18. *See In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claim 19, the dependent claims recites further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why the dependent claim is allowable.

e. Claim 23

As provided in claim 23, Applicants claim:

A data structure that is suitable for processing to produce a rendered document, the program comprising:

a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document;

a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document.

Applicants respectfully submit that independent claim 23 is allowable for at least the reason that *Brid* does not disclose, teach, or suggest at least all of the claimed features above.

For example, *Brid* describes a device-independent template which "defines how to display information" or may be regarded as a content structure. See col. 2, lines 38-63 and col. 3, lines 22-41. The device independent template is adapted for a particular device, and this is regarded as a device-specific template. In the examples of Fig. 4 and 5, they show how the device-specific template for Fig. 4 does not call for a chart to be displayed, where the device-specific template for Fig. 5 does. Each of the figures do show the same representations of the data that is common to both. Accordingly, *Brid* fails to teach or suggest "a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document," as recited in claim 23.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content are defined which may be styled for the second content portion. Therefore, for a requesting

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user, an approved combination of content for the first portion and the second portion is served to the requesting user when the document or web page is produced.

However, in *Brid*, there are no choices of content present. For example, *Brid* does not disclose producing a web page by incorporating an approved combination of content for a first content portion and a second content portion, where there are multiple choices of content available to be used in the first content portion and there are multiple choices of content available to be used in the second content portion, where an approved combination of a choice from the first portion and a choice from the second portion is what is used in the produced document. In contrast, *Brid* describes adapting a layout or template to a specific device implementation where some data elements may be omitted from the device-specific layout or template. Choices are not defined amongst alternative data elements that are representative of the same content.

In response to the statement in the final Office Action that *Brid* "does disclose labeling content choices approvable as to indicate to the server what choices of content from each portion of the web page are allowable for serving the entire web page (column 5, lines 54-67, with the defining of data elements to be displayed and the arranging of data elements on a layout seen as labeling an approved combination, since all of some of the content portions are served to the requesting user based on their display format," Applicant respectfully disagrees and iterates that *Brid* fails to disclose at least "a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document," as recited in claim 23. As explained above, *Brid* omits content portions from documents for a device-specific layout and does not define choices of content for a content portion of a document.

For at least these reasons, claim 23 is not anticipated by *Brid*. Therefore, the rejection of claim 23 should be withdrawn.

f. Claim 24

Because independent claim 23 is allowable over the cited art of record, dependent claim 24 (which depends from independent claim 23) is allowable as a matter of law for at least the reason that the dependent claim contains all the

features of independent claim 23. *See In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claim 24, the dependent claims recites further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why the dependent claim is allowable.

3.   Response to Rejections of Claims under 35 U.S.C. § 103

In the Office Action, claims 20, 22, and 25-27 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Brid* in view of *Lachhwani* (U.S. Patent Application Publication No. 2002/0116418 A1).
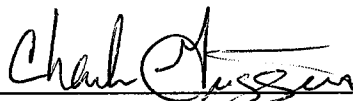
All of the claimed features of independent claim 18 are not taught and suggested by *Brid*, as previously discussed. Further, the cited art of *Lachhwani* fails to cure the deficiencies of the *Brid* reference in suggesting or teaching all of the claimed features in claims 18 or claims 20 & 22 (which depend from independent claims 18). Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Brid* with *Lachhwani* has not been made, and the rejections of claims 20 & 22 should be withdrawn.

Claims 25-27 are canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to these claims is rendered moot.

CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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